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Once Through Cooling Deadline: 8/15/06 5pm

From:

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To: Date:

Tue, Aug 8, 2006 3:07 PM

Subject:

otc scoping document

To whom it may concern.

To generators, cost has always been the trip wire for agencies which press for the elimination of otc.

In this context, you must consider that in Southern California, polluted beaches make millions of beach goers sick annually. A recent study determined that it may be cheaper to clean up the water and the watershed than it is to treat the sickened bathers.

In the case of once through cooling, impacts across the board are unknown, and the value of plankton and larval fish is based on its value as food commodity for humans. Generators and dischargers reason - and EPA supports their reasoning - that if you can't eat a plate of plankton or smear it on bread, or barbecue it, it must be worthless.

But much bread could we make without yeast? Yeast is worthless. Anybody can grow a bowl of it. But as a component of bread, it is essential.

We don't know where every larvae and plankton fits into the food chain, but we can be sure that their value has been underestimated by generators, and the scientists who feast at their table.

In the context of the example above, it may be cheaper to eliminate otc, than it is to patch up the holes in the food chain with untested methods.

Sincerely,

Tom Laurie 805 772 5038

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